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WATCH TOWER BIBLE AND TRACT
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UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In Re DMCA Subpoena to Google LLC.

X Case No. 7:19-mc-147

Watch Tower Bible and Tract
Society's Request to the Clerk for
Issuance of Subpoena to Google
LLC, Pursuant to 17 U.S.C. §
512(h) to Identify Alleged
Infringer

Petitioner, Watch Tower Bible and Tract Society of Pennsylvania (hereinafter "Watch Tower") through its undersigned counsel of record, hereby requests that the Clerk of this Court issue a subpoena to Google LLC to identify alleged infringers at issue, pursuant to the Digital Millennium Copyright Act ("DMCA"), 17 U.S.C. § 512(h) (hereinafter the "DMCA Subpoena"). The proposed DMCA Subpoena is attached hereto as Exhibit A.

The DMCA Subpoena is directed to Google LLC, the service provider of a YouTube account to which the infringing party using the name "JW Broadcasting" posted content at the URL:

https://www.youtube.com/watch?v=msVE5AJDcL8

This content infringes copyrights held by Watch Tower. (See Declaration of Paul

D. Polidoro dated March 26, 2019 (hereinafter "Polidoro Decl.").

Watch Tower has satisfied the requirements for issuance of a subpoena pursuant

to 17 U.S.C. § 512(h), namely:

(1) Watch Tower has submitted copies of notifications sent pursuant to 17

U.S.C. § 512(c)(3)(A) as Exhibit 1 to the Declaration of Paul D.

Polidoro.

(2) Watch Tower has submitted the proposed DMCA Subpoena attached

hereto as Exhibit A; and

(3) Watch Tower, through its counsel of record, has submitted a sworn

declaration confirming that the purpose for which the DMCA

subpoena is sought is to obtain the identity of an alleged infringer or

infringers, and that such information will only be used for the purpose

of protecting Watch Tower's rights under Title 17 U.S.C. §§ 100, et.

seq.. See Polidoro Decl., ¶ 4.

Having complied with the statutory requirements, Watch Tower respectfully

requests that the Clerk expeditiously issue and sign the proposed DMCA

Subpoena pursuant to 17 U.S.C. § 512(h)(4).

Dated: March 26, 2019

/s/ Paul D. Polidoro

Paul D. Polidoro

Associate General Counsel

SDNY Bar No. PP2509

WATCH TOWER BIBLE AND TRACT

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